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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

CHASOM BROWN, MARIA NGUYEN,
WILLIAM BYATT, JEREMY DAVIS, and
CHRISTOPHER CASTILLO, individually
and on behalf of all similarly situated,

Plaintiffs,

v.

GOOGLE LLC,
Defendant.

Case No. 5:20-cv-03664-LHK

**STIPULATION AND [PROPOSED]
ORDER EXTENDING TIME FOR
BRIEFING ON GOOGLE'S MOTION TO
DISMISS FIRST AMENDED
COMPLAINT**

Judge: Honorable Lucy H. Koh

1 This stipulation is entered into between Plaintiffs Chasom Brown, Maria Nguyen, William
2 Byatt, Jeremy Davis, and Christopher Castillo (collectively, “Plaintiffs”) and Google LLC
3 (“Google”), collectively referred to as the “Parties.”

4 WHEREAS, Plaintiffs filed their Class Action Complaint on June 2, 2020 against Google
5 LLC (“Google”);

6 WHEREAS, Google filed its Motion to Dismiss Complaint on August 2, 2020;

7 WHEREAS, Plaintiffs filed their Unopposed Motion for Leave to Propose Revised Motion
8 to Dismiss Briefing Schedule (Dkt. No. 62) informing the Court that Google consented to Plaintiffs’
9 filing of its First Amended Complaint by September 21, 2020;

10 WHEREAS, the Court granted Plaintiffs’ Unopposed Motion for Leave to Propose Revised
11 Motion to Dismiss Briefing Schedule and ordered the Parties to confer and “propose a revised
12 briefing schedule for the Court’s consideration” (Dkt. Nos. 62, 63);

13 WHEREAS, Plaintiffs filed their First Amended Class Action Complaint on September 21,
14 2020;

15 WHEREAS, the Parties met and conferred pursuant to the Court’s Order (Dkt. No. 63) on
16 September 30, 2020;

17 WHEREAS, pursuant to the Court’s Scheduling Notes, Google will email the Court for a
18 hearing date on the stipulated date on which Google’s Motion to Dismiss First Amended Complaint
19 is due, *i.e.*, on October 21, 2020; and

20 WHEREAS, the Parties understand that the December 3, 2020 hearing date for Google’s
21 original Motion to Dismiss Complaint (Dkt. No. 61) would need to be changed in light of the
22 stipulated briefing schedule below;

23 NOW THEREFORE, the Parties stipulate to the following briefing schedule:

- 24 1. The deadline for Google to file its Motion to Dismiss First Amended Complaint shall
25 be October 21, 2020;
- 26 2. The deadline for Plaintiffs to file any opposition to Google’s Motion to Dismiss First
27 Amended Complaint shall be November 18, 2020; and

3. The deadline for Google to file any reply in support of its Motion to Dismiss first Amended Complaint shall be December 7, 2020.

DATED: October 2, 2020

BOIES SCHILLER FLEXNER LLP

By /s/ Mark C. Mao

Mark C. Mao

Counsel on behalf of Plaintiffs

DATED: October 2, 2020

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

By /s/ Andrew H. Schapiro

Andrew H. Schapiro

Counsel on behalf of Google

ATTESTATION OF CONCURRENCE

I am the ECF user whose ID and password are being used to file this Stipulation and [Proposed] Order Extending Time for Briefing on Google's Motion to Dismiss First Amended Complaint. Pursuant to Civil L.R. 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in the filing of this document

Dated: October 2, 2020

By /s/ Andrew H. Schapiro

Andrew H. Schapiro

Counsel on behalf of Google

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[PROPOSED] ORDER

Pursuant to stipulation of the parties, the Court hereby **ORDERS:**

1. The deadline for Google to file its Motion to Dismiss First Amended Complaint shall be extended to October 21, 2020.
2. The deadline for Plaintiffs to file any opposition to Google’s Motion to Dismiss First Amended Complaint shall be extended to November 18, 2020.
3. The deadline for Google to file any reply in support of its Motion to Dismiss first Amended Complaint shall be extended to December 7, 2020.

IT IS SO ORDERED.

DATED: _____, 2020

Hon. Lucy H. Koh
United States District Judge